

Marquise 7 Enterprises, LLC (the “Debtor”) and to foreclose its first-priority interest in Debtor’s real property (as defined in the Motion, the “Property”).

2. As set forth in the Motion, Ameris is the single secured creditor of the Debtor and this is the second bankruptcy petition in a long effort to delay and hinder Ameris’ legitimate rights under its Loan Documents, including Ameris’ prosecution of the State Court Action.

3. Counsel for the Debtor has informed Ameris that (i) there is no insurance on the Property and (ii) the Debtor does not oppose relief from stay. Counsel for the Debtor has not given its consent to that portion of the Motion for Relief seeking to bar any further bankruptcy petition by Debtor until Ameris has prosecuted its State Court Action and foreclosed on its interest in the Property.

4. The Debtor has also learned that there are numerous issues respecting the deteriorating condition of the Property, including, *inter alia*, broken windows and lights that require Ameris’ immediate access to the Property.

5. Accordingly, Ameris requests that a hearing on its Motion for Relief be set on March 15, 2011 on an expedited basis.

WHEREFORE, Ameris prays that the Court enter an Order in substantially the same form as attached hereto as Exhibit A (i) setting an expedited hearing on Ameris’ Motion for Relief for March 15, 2011, and (ii) for such other and further relief as the Court deems just and proper.

Dated: March 7, 2011

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By: //s/Valerie K. Richmond

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the ***MOTION FOR EXPEDITED HEARING ON MOTION FOR RELIEF FROM THE AUTOMATIC STAY*** was served on: (i) all Filing Users by electronic notification through the Notice of Electronic Filing; and (ii) all of the below listed parties via first class U.S. Mail in a properly addressed envelope with sufficient postage affixed thereto ensure delivery.

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Dated: March 7, 2011

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